

Mr. George B. Brittain
DaimlerChrysler Corporation
2401 S. Reed Road
Kokomo, Indiana 46904-9007

Re: 067-11981
Second Administrative Amendment to
Part 70 No. 067-6504-00065

Dear Mr. Brittain:

DaimlerChrysler Corporation was issued a permit on September 1, 1999, for the Kokomo Transmission Plant (KTP). A letter requesting the revision of the stack testing language in Condition D.1.5 of the permit was received on March 7, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as described in the attached Technical Support Document (TSD) and as follows (bold emphasis added to new language):

1. Condition D.1.5 on Page 33 of the permit has been revised as follows:

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 12 months after issuance of this permit, the Permittee shall perform PM testing ~~simultaneously~~ for Boilers 1, Boiler 2, ~~Boiler and 3, Boiler 4 and Boiler 5~~ utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. **The testing shall be performed when Boilers 1, 2 and 3 are operating simultaneously and are the only emission units exhausting to the common stack being tested.** This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boiler 1, Boiler 2, and Boiler 3. **Boilers 4 and 5 may be idled during the test to maintain standby status, but all PM emissions measured during the test shall be attributed to Boilers 1, 2, and 3 for the purpose of determining compliance. Should circumstances require the operation of Boiler 4 and/or Boiler 5 to meet steam demand of the plant during a scheduled test, such circumstances may be considered grounds for rescheduling the test, or retesting, if determined appropriate by the IDEM, OAM.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Janusz Johnson, at (800) 451-6027, press 0
and ask for extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

JKJ

cc: File - Howard County
U.S. EPA, Region V
Howard County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**DaimlerChrysler Corporation
Kokomo Transmission Plant, Plt ID 067-00003
2401 S. Reed Road
Kokomo, Indiana 46904**

and

**DaimlerChrysler Corporation
Kokomo Casting Plant, Plt ID 067-00002
1001 East Boulevard
Kokomo, Indiana 46904**

(DaimlerChrysler Corporation, Kokomo Casting Plant was issued a separate Title V permit, T067-5246-00065. Each is considered part of one Title V major source)

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|---|----------------|
| Operation Permit No.: T067-6504-00065 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: |

First Administrative Amendment 067-11399, issued November 9, 1999

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|---|----------------|
| Second Administrative Amendment: 067-11981 Page Affected: 33 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) spreader stoker boiler, identified as Boiler 1, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

One (1) spreader stoker boiler, identified as Boiler 2, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

One (1) spreader stoker boiler, identified as Boiler 3, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 326 IAC 6-1-15 Nonattainment area particulate limitations: Howard County

Pursuant to 326 IAC 6-1-15 (Howard County) particulate emissions shall be limited to 875.7 tons per year and 0.75 pounds per million Btu for Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from each MM 47 Btu per hour coal fired boilers shall not exceed six (6.0) pounds per MMBtu heat input. Based on a heating value of 11,943 Btu per 1 pound of coal, the fuel sulfur content of the coal used for fuel shall be limited to 3.8 percent (%).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.1.4 Nonapplicable Requirements [326 IAC 2-7-5 (a)(2)]

The requirements that are not applicable to this boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) Boiler 1, Boiler 2, and Boiler 3 are exempt from 40 CFR Part 60.40c Subpart Dc since the boilers were constructed in 1955 which predates Subpart Dc applicability date of June 9, 1989.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 12 months after issuance of this permit, the Permittee shall perform PM testing for Boilers 1, 2 and 3 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. The testing shall be performed when Boilers 1, 2 and 3 are operating simultaneously and are the only emission units exhausting to the common stack being tested. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boilers 1, 2 and 3. Boilers 4 and 5 may be idled during the test to maintain standby status, but all PM emissions measured during the test shall be attributed to Boilers 1, 2, and 3 for the purpose of determining compliance. Should circumstances require the operation of Boiler 4 and/or Boiler 5 to meet steam demand of the plant during a scheduled test, such circumstances may be considered grounds for rescheduling the test, or retesting, if determined appropriate by the IDEM, OAM.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Operating Permit

Source Background and Description

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|---------------------------------|---|
| Source Name: | DaimlerChrysler - Kokomo Transmission Plant (KTP) |
| Source Location: | 2401 South Reed Road |
| County: | Howard |
| SIC Code: | 3714 |
| Operation Permit No.: | T067-6504-00065 |
| Operation Permit Issuance Date: | September 1, 1999 |
| Administrative Amendment No.: | 067-11981 |
| Permit Reviewer: | Janusz Johnson |

The Office of Air Management (OAM) has reviewed an amendment application from DaimlerChrysler requesting the revision of the stack testing language in Condition D.1.5 of the permit to allow, but not require, operation of Boilers 4 and 5 during the testing of Boilers 1, 2 and 3 if required to meet the heating/steam needs of the plant.

History

The testing language originally proposed for Boilers 1, 2 and 3 in the draft Part 70 permit was intended to require testing of these three (3) coal fired boilers against the particulate matter limit specified for them in 326 IAC 6-1-15 and Condition D.1.1 of the permit. The original condition was as follows:

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 6 and 12 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for boilers 1, 2 and 3.

Based on comments made by DaimlerChrysler during the draft period, the condition was changed to the following:

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 12 months after issuance of this permit, the Permittee shall perform PM testing simultaneously for Boiler 1, Boiler 2, Boiler 3, Boiler 4 and Boiler 5 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration for Boiler 1, Boiler 2, and Boiler 3.

The changes were made to clarify the testing requirements and account for the fact that Boilers 4 and 5 shared a common stack with Boilers 1, 2 and 3, and might need to be in operation during the test to provide steam for the plant. Unfortunately, the changes made did not accurately address the concerns of DaimlerChrysler or provide for meaningful testing of the three (3) coal fired boilers as was originally intended.

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

An application for the purposes of this review was received on March 7, 2000.

Justification for Modification

The Part 70 Operating Permit is being revised through an Administrative Amendment. This amendment is being performed pursuant to 326 IAC 2-7-11(a)(7) because it makes a change to a monitoring requirement that is not environmentally significant.

Determination

The IDEM, OAM, believes that meaningful stack test results for Boilers 1, 2 and 3 cannot be obtained if Boilers 4 and 5 are operating during the test because the five (5) boilers share a common stack and there would be no way to distinguish what emissions came from the respective boilers without making considerable assumptions. The IDEM, OAM, also understands the concerns of DaimlerChrysler; specifically that the need to operate Boilers 4 and 5 to provide adequate steam for the plant may be influenced by uncontrollable factors such as weather. To ensure enforceable stack test results, the condition will be revised to clearly require stack testing when only Boilers 1, 2 and 3 are operating; however, the condition will also address the possible need to operate Boilers 4 and 5 by including a provision for idling Boilers 4 and 5 during the test to maintain standby status, if needed. The revised condition will also note that operation of Boilers 4 and 5 during the test may be considered grounds for rescheduling the testing. The feasibility of operating only Boilers 1, 2 and 3 during stack testing should be considered when scheduling the test to minimize the possibility of needing to operate Boilers 4 and 5.

Conclusion

The operation of the Boilers 1, 2 and 3 shall be subject to the conditions of the Part 70 Operating Permit (067-6504-00065) as revised by the attached **Administrative Amendment No. 067-11981-00065**.